

**STATE OF NEW MEXICO  
BEFORE THE SECRETARY OF ENVIRONMENT**

**NEW MEXICO ENVIRONMENT  
DEPARTMENT RESOURCE PROTECTION DIVISION,**

**Complainant,**  
v.

**No. SWB 20-001 (CO)**

**BL SANTA FE, LLC,**

**And**

**HRV HOTEL PARTNERS, LLC,**

**Respondents.**

**RESPONDENT HRV HOTEL PARTNERS, LLC'S  
NOTICE OF EXPECTED WITNESSES**

**COMES NOW** Respondent HRV Hotel Partners, LLC., through its counsel of record, Domenici Law Firm, P.C. (Pete V. Domenici, Jr.) and submits its Notice of Expected Witnesses pursuant to 20.1.5.300(B) NMAC and the Amended Scheduling Order dated November 23, 2021.

Respondent HRV Hotel Partners, LLC. will or may call any witnesses disclosed by NMED or BL Santa Fe, LLC on their witness disclosures.

HRV will or may call staff from the NMED Groundwater Quality Bureau to address permitting, closure and compliance issues regarding DP-75 and the subject matter of the hearing.

HRV will or may call employees from Intera to address GWB issues, DP-75 and their contract relationships and involvement in the subject matter of the hearing.

HRV may call foundation witnesses to authenticate documents, if needed.

Respectfully submitted,

DOMENICI LAW FIRM, P.C.

/s/ Pete V. Domenici, Jr.

Pete V. Domenici, Jr., Esq.

320 Gold Avenue SW, Suite 1000

Albuquerque, New Mexico 87102

(505) 883-6250

[pdomenici@domenicilaw.com](mailto:pdomenici@domenicilaw.com)

*Counsel for Respondent HRV Hotel Partners, LLC.*

### **CERTIFICATE OF SERVICE**

I hereby certify that on this \_\_12th\_\_ day of January 2022, a true and correct copy of the foregoing *Respondent HRV Hotel Partners, LLC's Notice of Expected Witnesses* was served via first class mail and email to the following:

Madai Corral  
Office of Public Facilitation  
New Mexico Environment Department  
1190 St. Francis Drive, Santa Fe, NM 87505  
[Madai.corral@state.nm.us](mailto:Madai.corral@state.nm.us)

*Hearing Clerk*

Christopher Atencio  
Assistant General Counsel  
Legislative & Policy Legal Analyst  
New Mexico Environment Department  
Office of General Counsel  
121 Tijeras Ave. NE  
Albuquerque, NM 87102  
[Christopher.atencio@state.nm.us](mailto:Christopher.atencio@state.nm.us)

*Counsel for the New Mexico Environment Department*

Gregory J. Marshall  
Snell & Wilmer, LLP.  
One Arizona Center  
400 E. Van Buren  
Phoenix, AZ 85004-2202  
Telephone: (602) 382-6514  
Email: [gmarshall@swlaw.com](mailto:gmarshall@swlaw.com)

*Counsel for Respondent BL Santa Fe, LLC*

/s/ Pete V. Domenici, Jr.  
Pete V. Domenici, Jr., Esq.